

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et
al.*

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

THIS PLEADING RELATES
ONLY TO THIS TITLE II
CASE²

(Jointly Administered)

Re: Docket No. 8297

MOTION FOR BRIEF ADDITIONAL EXTENSION OF TIME

TO THE HONORABLE COURT:

COME NOW, creditors Jorge A. Diaz Mayoral and Juan A. Frau Escudero (“Movants”), by the undersigned counsel, and, very respectfully, state, allege and pray:

1. On September 25, 2019, Movants filed a motion requesting this Honorable Court reconsider and vacate the bench order sustaining the *Sixty-Fourth Omnibus Objection to Claims* with respect to the Movants’ Claims Nos. 152,470 and 152,283 and allow Movants to supplement their response regarding their personal injury; or in the alternative, hold an evidentiary hearing where the Movants may present evidence

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² This clarification is made in accordance to the Court’s *Order (A) Pursuant to PROMESA Section 304(G), Directing Joint Administration of Initial Title III Cases and Additional Title III Cases, and (B) Pursuant to Section 105(A) of The Bankruptcy Code, Making Certain Orders Entered on First Day Pleadings Applicable to the Additional Title III Cases*. See, Docket No. 167 at ¶ 5 of p. 4.

regarding their personal injury; or, in the alternative, that the Movants be allowed to amend their proofs of claim to present evidence regarding their personal injury, which would then be subject to any future objection that the Commonwealth may file, if any. (Docket No. 8760).

2. On September 26, 2019, the Court entered a briefing order, setting October 1, 2019 as the date for the Debtors to respond to Movant's motion to alter or amend and setting October 4, 2019 as the date for Movants to Reply. (Docket No. 8763).

3. On October 1, 2019, the Debtors filed their response. (Docket No. 8803).

4. On October 4, 2018, the Movants requested an extension of time to respond of 7 days until October 11, 2019 (Docket No. 8814) and the court granted the requested extension. (Docket No. 8817).

5. In spite of the undersigned's best efforts, Movant's need a very brief additional extension to finalize and file the reply to the Debtors' response to the Motion to Alter or Amend.

6. Because of the sheer volume of information contained in the 172 page proposed Plan (Docket No. 8765) and 1,876 page Disclosure Statement (Docket No. 8766), the Movants have not finished their analysis and their revisions to the Reply.

7. Therefore, it is necessary to request a very brief second extension of time to properly respond to Docket No. 8803 and the Movants, hereby request one additional working day, extending the deadline from Friday, October 11, 2019 until Tuesday, October 15, 2019 to file their Reply.

WHEREFORE, the Movants respectfully request the Honorable Court to grant them a one working day extension of time, from Friday, October 11, 2019 until Tuesday, October 15, 2019, to file the Movants' reply to the Debtors' response to the Motion to Alter or Amend (Docket No. 8760).

I HEREBY CERTIFY that the foregoing has been filed with the Court's CM/ECF which will automatically send an exact copy to all parties so subscribed on this 11th day of October, 2019, including the attorneys for the Financial Oversight and Management Board as representative for the Commonwealth: Hermann D. Bauer and Daniel J. Pérez-Refojos, both of O'Neill & Borges, LLC and Martin J. Bienenstock of Proskauer Rose, LLP.

RESPECTFULLY SUBMITTED, in San Juan, Puerto Rico, this 11th day of October, 2019.

Attorney for
Jorge A. Díaz Mayoral and
Juan A. Frau Escudero

s/Monique J. Díaz Mayoral
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Proposed Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Debtors.³

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

ORDER APPROVING EXTENSION OF TIME

Upon consideration of the *Motion for Brief Additional Extension of Time* (the “Motion”), filed on October 11, 2019 in Docket No. ____, by Jorge A. Díaz Mayoral and Juan A. Frau Escudero, and the Court having found and determined that (i) the Court has jurisdiction over this proceeding pursuant to 28 U.S.C. § 1331 and 48 U.S.C. § 2166(a); (ii) venue of this proceeding is proper under 28 U.S.C. § 1391(b) and 48 U.S.C. § 2167(a); and (iii) the Court having found good cause to grant the relief requested therein, it is **HEREBY ORDERED THAT:**

1. The Motion is **GRANTED** as set forth herein.
2. The deadline to reply to Docket No. 8803 is extended through October 15, 2019.

SO ORDERED.

Dated October __, 2019
San Juan, Puerto Rico

HONORABLE LAURA TAYLOR SWAIN
UNITED STATES DISTRICT JUDGE

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